

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: CC Docket No. 02-33
Notice of Proposed Rulemaking (FCC 02-42)

May 2, 2002

Dear Ms. Dortch:

On behalf of Odessa Office Equipment, I am writing to express my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA"), and to urge the Commission not to impose Universal Service Fund obligations on smaller license-exempt providers of wireless broadband services.

We are a small local business with a staff of just 3 part time people. Since the spring of 2000, we have been using the 2.4 GHz license-exempt bands to provide high-speed Internet access to Odessa, Wilbur, Creston and Ephrata Wa., where there is little or no cable modem or DSL service. Even where DSL is available, we are the only competitive alternative. Despite our small size and lack of funding from the government or the capital markets, we have been able to provide our customers with the type of broadband service usually available only in the larger cities, and we are doing so at a lower price than the competition. We also are providing broadband service to the Odessa Memorial Hospital and (free of charge) the Town of Odessa (which also includes the local library), giving those entities the ability to use broadband to deliver better and more cost-efficient services to their constituents.

While we generally support the broad objectives of universal service, we do not believe it is equitable to sacrifice the future of wireless broadband (which operates without subsidy) to support "copper wire" services that wireless is better equipped to provide in underserved areas. Also, we are not an ILEC or a cable MSO, and we simply cannot afford the personnel or administrative resources necessary for USF compliance. Any diversion of our meager staff will have a direct and immediate adverse effect on our ability to serve our customers. Our business, in other words, would be put at unnecessary risk, and our customers ultimately would pay the price.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller license-exempt providers of broadband service. Thank you.

Very truly yours,
Marlon K. Schafer
Owner
Odessa Office Equipment